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May 4, 2023

**Via ECF**

Hon. Ann Marie Donio, U.S.M.J.  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

**Re: *Tiffanee Gould, et al. v. The Guida-Seibert Dairy Company, et al.***  
**Case No. 1:22-cv-01861-NLH-AMD**  
**Proposed Confidentiality Order**

Dear Judge Donio:

This firm represents Defendant The Guida-Seibert Dairy Company in the above-referenced matter. Enclosed for Your Honor's review and consideration is a Discovery Confidentiality Order generally in the form of Appendix S (*see* Exhibit A). Deviations from the standard Appendix S confidentiality order are reflected in track change form in Exhibit B. If the proposed Discovery Confidentiality Order (Exhibit A) meets with Your Honor's approval, the parties respectfully request that the Discovery Confidentiality Order be So Ordered and entered with the Clerk of the Court.

Thank you for your time and consideration of this matter.

Respectfully Submitted,

*/s/ Philip A. Goldstein*

Philip A. Goldstein

PAG:  
Enclosures

cc: All Counsel of Record (via ECF)

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